



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

12300 W Dakota Ave , Suite 110
Lakewood, CO 80228

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 8, 2007

Ms. Meg Yeage
President
ConocoPhillips Pipeline
600 North Dairy Ashford
TA 2010
Houston, TX 77079

SENT TO COMPLIANCE REGISTRY
Hardcopy Electronically ✓
of Copies 1 / Date 2-9-07

CPF 5-2007-5006W

Dear Ms. Yeage:

On September 5-8, 2006 a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Seminole pipeline between Billings, Montana and Casper, Wyoming as well as records in Casper, Wyoming.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

1. §195.505 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

- (b) Ensure through evaluation that individuals performing covered tasks are qualified;**

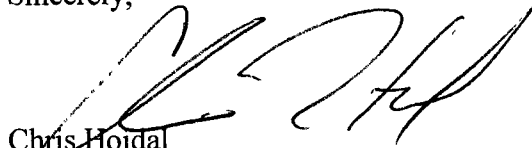
ConocoPhillips Pipelines' (CPPL's) Pipeline Leak and Inspection Report No. SM01-GWB-04-001 did not document the names of individuals that completed repairs made to their Seminole pipeline.

CPPL's Pipeline Leak and Inspection Report No. SM01-GWB-04-001 shows that repairs were made to their 8-inch Seminole pipeline using an Armor Plate Pipe Wrap Repair System, but records only indicate the name of the contractor and not the individuals who installed this sleeve. Though CPPL was able to provide documentation of both contractor employees and CPPL employees that were reported to have made this repair, the Pipeline Leak and Inspection Report does not reflect the names of those individuals.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violations persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Be advised that failure to do so will result in CPPL being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2007-5006W**.

Sincerely,

A handwritten signature in black ink, appearing to read 'CHoidal', is written over the printed name.

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 (G. Davis, #116724)